

EXHIBIT A
(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

**ORDER AUTHORIZING TRUSTEE TO FILE
CERTIFICATE OF SERVICE UNDER SEAL**

Upon the *Ex Parte* Application (“Application”) of the Trustee¹ for an order, pursuant to and sections 105(a) and 107(c) of the Bankruptcy Code and Bankruptcy Rule 9018, authorizing the Trustee to file under seal the certificate of service (“Certification of Service”) relating to the Trustee’s Termination Motion; and the Court having reviewed the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief requested therein; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to section 78eee(b)(4) of SIPA, 28 U.S.C. §§ 157 and 1334; and venue being proper in this district pursuant to section 78eee(b)(4) of SIPA and 28 U.S.C. §§ 1408 and 1409; and it appearing that no notice of the Application is necessary; it is hereby,

ORDERED, that the relief requested in the Application is granted; and it is further

ORDERED, that the Trustee may file the Certificate of Service under seal pursuant to sections 105(a) and 107(c) of the Bankruptcy Code and Bankruptcy Rule 9018.

Dated: New York, New York
May __, 2009

HONORABLE BURTON R. LIFLAND
UNITED STATES BANKRUPTCY JUDGE

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Application.